

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In re:

Connector 2000 Association, Inc.,

Debtor.

Case No. 10-04467-dd
Chapter 9

**AMENDED¹ NOTICE OF (A) HEARING TO CONFIRM DEBTOR'S FIRST AMENDED
PLAN FOR ADJUSTMENT OF DEBTS; (B) OBJECTION AND VOTING DEADLINES;
AND (C) SOLICITATION AND VOTING PROCEDURES**

PLEASE TAKE NOTICE THAT in the above-captioned case on January 21, 2011, the United States Bankruptcy Court for the District of South Carolina (the "Court") entered an Order: (I) Scheduling Hearing on Confirmation of the First Amended Plan for Adjustment of Debts; (II) Approving Solicitation Procedures; (III) Establishing Deadlines; and (IV) Approving Form and Manner of Notice of the Confirmation Hearing (the "Solicitation Procedures Order"). In the Solicitation Procedures Order, the Court scheduled certain hearings and objection deadlines and approved certain solicitation and voting procedures with respect to the Debtor's First Amended Plan for Adjustment of Debts (including all exhibits thereto and as amended, modified or supplemented from time to time, the "First Amended Plan"), all as set forth below.

PLEASE TAKE FURTHER NOTICE THAT on January 5, 2011, a hearing was held to approve the adequacy of Debtor's First Amended Disclosure Statement for the First Amended Plan (including all exhibits thereto and as amended, modified or supplemented from time to time, the "First Amended Disclosure Statement"). Following the hearing on the First Amended Disclosure Statement, the Court approved the First Amended Disclosure Statement.

PLEASE TAKE FURTHER NOTICE THAT on **March 25, 2011 at 10:00 a.m. prevailing Eastern Time**, a hearing to confirm the First Amended Plan (the "Confirmation Hearing") will be conducted by the Honorable David R. Duncan, United States Bankruptcy Court for the District of South Carolina, at the Donald Stuart Russell Federal Courthouse, 201 Magnolia Street, Spartanburg, South Carolina. The Confirmation Hearing may be continued from time to time by announcing such continuance in open court or otherwise. Prior to the Confirmation Hearing, the Court, in its discretion, may put in place additional procedures governing the Confirmation Hearing.

PLEASE TAKE FURTHER NOTICE THAT the Bankruptcy Court has established (i) **March 16, 2011, at 5:00 p.m. prevailing Eastern Time** as the last date and time for filing and serving objections to the confirmation of the First Amended Plan (the "Plan Objection Deadline"). Objections not filed and served by the Plan Objection Deadline in the manner set

¹ This Notice is being amended solely to include notice of the releases and injunctions contained in the First Amended Plan as provided in Bankruptcy Rule 2002(c)(3).

forth as follows may not be considered by the Court. All objections must state with particularity the grounds for such objection. In order to be considered by the Court, objections, if any, to the First Amended Plan must be in writing and must be: (a) filed via the Court's CM/ECF system on or before the Objection Deadlines; and (b) served on the following parties (collectively, "Notice Parties"): (1) counsel for the Debtor; (2) counsel for the Senior Bonds Trustee; (3) counsel for the Subordinate Bonds Trustee; (4) counsel for the South Carolina Department of Transportation; (5) counsel for the State of South Carolina; and (6) any other parties who have filed a Notice of Appearance in this case.

Holders of claims in **Class 4, Class 5 and Class 6** must complete all required information on the Ballot, execute the Ballot, and **return the completed Ballot to the Solicitation Agent such that the Ballot is actually received by the Solicitation Agent by not later than 4:00 p.m., prevailing Eastern Time, March 4, 2011.** Any failure to follow the voting instructions included with the relevant Ballot may disqualify that Ballot and the corresponding vote.

Holders of claims in **Class 1 and Class 2** must complete all required information on the Ballot, execute the Ballot, and **return the completed Ballot to the Voting Nominee such that the Ballot is received in sufficient time to allow the Voting Nominee to receive the Ballot and summarize the results on a Master Ballot and return the Master Ballots such that they are actually received by the Solicitation Agent by the March 4, 2011 deadline as set forth below.** Any failure to follow the voting instructions included with the relevant Ballot may disqualify that Ballot and the corresponding vote.

The Voting Nominee for holders of claims in Class 1 and Class 2 must complete all required information on their Master Ballots, execute the Master Ballots, and **return the completed Master Ballots to the Solicitation Agent such that the Master Ballots are actually received by the Solicitation Agent by not later than 4:00 p.m., prevailing Eastern Time, on March 4, 2011.** Any failure to follow the voting instructions included with a relevant Master Ballot may disqualify that relevant Master Ballot and the corresponding vote.

PLEASE TAKE FURTHER NOTICE THAT the Solicitation Package (without ballots or master ballots) can be accessed over the internet at the website of the Debtor at <http://www.southernconnector.com>. **If you have any questions regarding materials relating to the First Amended Plan or the First Amended Disclosure Statement,** or if you require additional information concerning the procedures for voting to accept or reject the First Amended Plan, or if you believe you are entitled to receive a Solicitation Package and did not receive one, **please contact the Solicitation Agent,** Epiq Bankruptcy Solutions, LLC, via telephone at (646) 282-2400.

NOTICE OF RELEASES AND INJUNCTIONS CONTAINED IN THE FIRST AMENDED PLAN

<p>THE FIRST AMENDED PLAN PROVIDES, INCLUDING AS FURTHER SET FORTH IN ARTICLE V OF THE FIRST AMENDED PLAN, FOR RELEASES OF AND INJUNCTIVE RELIEF TO THOSE PERSONS AND ENTITIES WHO ARE</p>

EITHER (1) PROVIDING SUBSTANTIAL CONSIDERATION TO THE ESTATE OR (2) SUBSTANTIALLY COMPROMISING THEIR CLAIMS. THE PERSONS AND ENTITIES SUBJECT TO THE INJUNCTION, AND THE SCOPE OF THE RELEASES AND INJUNCTION, ARE IDENTIFIED AND DEFINED IN ARTICLE V OF THE FIRST AMENDED PLAN. IF THE FIRST AMENDED PLAN IS CONFIRMED, ALL PERSONS AND ENTITIES IDENTIFIED IN THESE PROVISIONS OF THE FIRST AMENDED PLAN WILL BE RELEASED FROM THE CLAIMS OF ANY CREDITOR OR PARTY IN INTEREST IN THIS CASE WHETHER OR NOT SUCH CREDITOR OR PARTY IN INTEREST VOTED ON THE FIRST AMENDED PLAN.

NOTICE OF ACTS TO BE ENJOINED BY CONFIRMATION OF THE FIRST AMENDED PLAN

EXCEPT AS OTHERWISE PROVIDED IN THE FIRST AMENDED PLAN, FROM AND AFTER THE EFFECTIVE DATE, ANY AND ALL POTENTIAL CLAIMANTS SHALL BE PERMANENTLY ENJOINED FROM COMMENCING OR CONTINUING IN ANY MANNER, ANY SUIT, ACTION OR OTHER PROCEEDING, ON ACCOUNT OF OR RESPECTING ANY CLAIM, OBLIGATION, DEBT, RIGHT, CAUSE OF ACTION, REMEDY OR LIABILITY, OR ANY OTHER CLAIM OR CAUSE OF ACTION RELEASED OR TO BE RELEASED PURSUANT HERETO, AGAINST THE DEBTOR OR ANY OR ALL OF THE PLAN RELEASEES IDENTIFIED AND DEFINED IN ARTICLE V OF THE FIRST AMENDED PLAN.

The First Amended Plan permanently enjoins the commencement or prosecution by any person or entity, whether directly, derivatively or otherwise, of any Claims, obligations, suits, judgments, damages, demands, debts, rights, causes of action or liabilities, released pursuant to the First Amended Plan against any Plan Releasee. Thus, as further provided in the First Amended Plan, all parties having a claim against the Debtor or any Plan Releasee arising prior to the Effective Date of the First Amended Plan SHALL WITH RESPECT THERETO BE ENJOINED ON AND AFTER THE EFFECTIVE DATE FROM:

- Commencing, conducting, or continuing in any manner, directly or indirectly, any suit, action, or other proceeding of any kind against any of the Plan Releasees or his/her/its direct or indirect successor in interest (including, without limitation, all suits, actions, and proceedings that are pending, or may be filed as of the

Effective Date), which must be withdrawn or dismissed with prejudice;

- enforcing, levying, attaching, collecting, or otherwise recovering by any manner or means, whether directly or indirectly, any judgment, award, decree or order against any of the Plan Releasees or his/her/its assets or property, or its direct or indirect successor in interest, or any assets or property of such successor;
- creating, perfecting, or otherwise enforcing in any manner, directly or indirectly, any lien against any of the Plan Releasees or his/her/its assets or property, or his/her/its direct or indirect successors in interest, or any assets or property of such successor;
- asserting any set-off, right of subrogation, or recoupment of any kind, directly or indirectly, against any obligation due any of the Plan Releasees or his/her/its assets or property, or his/her/its direct or indirect successors in interest, or any assets or property of such successor; and
- proceeding in any manner that does not conform or comply with the provisions of the First Amended Plan.

In addition, all injunctions or stays, whether by operation of law or by order of the Bankruptcy Court, provided for in the Case pursuant to Sections 105, 362, 524, or 922 of the Bankruptcy Code, or otherwise that are in effect on the Confirmation Date, shall remain in full force and effect until the Final Decree.